

**CANADA  
PROVINCE OF QUÉBEC  
DISTRICT OF MONTRÉAL**

**CLASS ACTIONS DIVISION  
SUPERIOR COURT**

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**NO : 500-06-001263-231**

**THE CLASS**

and

**ASSOCIATION FOR THE RIGHTS OF  
HOUSEHOLD AND FARM WORKERS**

Representative Plaintiff

and

**BYRON ALFREDO ACEVEDO TOBAR**

Designated Member

v.

**ATTORNEY GENERAL OF CANADA**

Defendant

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**REPRESENTATIVE PLAINTIFF'S APPLICATION FOR PARTICULARS**  
(Code of Civil Procedure, CQLR c. C-25.01, sections 20 and 169)

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**TO:**

M<sup>re</sup> Mariève Sirois-Vaillancourt  
M<sup>re</sup> Emilie Tremblay  
M<sup>re</sup> Kim Nguyen  
M<sup>re</sup> Sean Doyle  
M<sup>re</sup> Maria Rodriguez  
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Counsel for the Defendant, Attorney General of Canada

**TAKE NOTICE** that the Representative Plaintiff's Application for Particulars will be presented to the Honourable Pierre Nolle, J.S.C., sitting in the judicial district of Montréal and designated to act as special case management judge to manage the proceeding and hear all procedural matters relating to the class action, at the Montréal Courthouse, located at 1 Notre-Dame Street East, Montréal, Québec, H2Y 1B6, at a time and in a courtroom to be determined by the Court.

The Representative Plaintiff's Application for Particulars rests on the following grounds:

1. On February 13, 2026, the Defendant filed its Defence in the present class action. The Defence contains allegations which are vague and ambiguous, as described hereafter. The Representative Plaintiff requires the particulars set out below, which are conducive to a fair debate and to the orderly conduct of the class action.
103. At paragraph 103 of the Defence, the Defendant alleges that "*some of the Designated Member's allegations are overstated*" and proceeds to give one (1) example, without specifying which other of the Designated Member's allegations, if any, are overstated.
120. At paragraph 120 of the Defence, the Defendant alleges that "*the Regulations provide mechanisms for employer-specific permit workers to change employment and/or employer*" without specifying which mechanisms are invoked by the Defendant.
148. At paragraph 148 of the Defence, the Defendant alleges that "[v]arious preventive and curative measures exist, including those contained in the OWP-V and also, among others, the possibility to leave and/or change employer, voluntary departure from Canada, which are tailored to address the potential vulnerabilities alleged by the Representative Plaintiff" (our emphasis), without specifying which other preventive and curative measures, if any, are alleged by the Defendant to be "*tailored to address the potential vulnerabilities alleged by the Representative Plaintiff*".
176. At paragraph 176 of the Defence, after having alleged objectives for the *Immigration and Refugee Protection Act*, SC 2001, c. 27, for the impugned provisions of the *Immigration and Refugee Protection Regulations*, SOR/2002-227, and for immigration programs, the Defendant alleges that "[t]he objectives described above are not exhaustive and will be more fully developed at trial", without specifying which additional objectives, if any, will be invoked by the Defendant, despite this being a central question which impacts the analysis under section 7 and section 1 of the *Canadian Charter of Rights and Freedoms*.
191. At paragraph 191 of the Defence, the Defendant alleges that the impugned provisions "*also provide remedies and reasonable tools, including to temporary foreign workers facing difficulties or wanting to change employers*", without specifying which remedies and tools are invoked by the Defendant.

**WHEREFORE, THE REPRESENTATIVE PLAINTIFF WILL ASK THE COURT TO :**

**GRANT** the Representative Plaintiff's Application for Particulars;

**ORDER** the Defendant to provide the particulars sought herein within thirty (30) days of judgment, under pain of the allegations identified herein being struck;

**THE WHOLE** without costs, unless contested.

**DO GOVERN YOURSELF ACCORDINGLY.**

Montréal, March 12, 2026



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**DAVIES WARD PHILLIPS & VINEBERG LLP**  
Counsel for the Representative Plaintiff

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M<sup>tre</sup> Guillaume Charlebois

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File : 287026

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ORIGINAL

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**DAVIES**

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